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May 30, 2014

VIA ECF FILING

Honorable Allan L. Gropper  
United States Bankruptcy Court  
Alexander Hamilton Custom House  
One Bowling Green  
New York, NY 10004-1408

Re: *Tronox Incorporated v. Kerr-McGee Corporation*, Adv. Pro. No. 09-01198

Dear Judge Gropper:

Pursuant to Federal Rule of Bankruptcy Procedure 9033(c), Defendants in the above-referenced adversary proceeding respectfully request that the Court extend the time for filing objections to any Report and Recommendation issued by this Court recommending approval of the Settlement from 14 days to 35 days. When taking into account the time for mailing the notice of the Report and Recommendation, Defendants respectfully request that the Court set the objection deadline for 38 days after the issuance of the Report and Recommendation. Defendants believe that sufficient cause exists to extend the objection deadline given the significance of the Settlement and widespread interest in the case. The extension also will provide counsel receiving notice of the Report and Recommendation additional time to notify their clients. The Litigation Trust and the United States do not object to the extension of the deadline.

Sincerely,

/s/ Kenneth N. Klee

Kenneth N. Klee

CCs (via email):  
Jeffrey Zeiger, Counsel for the Litigation Trust

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Robert Yalen, Counsel for the United States

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